

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5**

IN THE MATTER OF:

**Waste Management of Ohio
2625 East Broadway Street
Northwood, Ohio 43619**

ATTENTION:

**John Randolph
District Engineer**

Request to Provide Information Pursuant to the Clean Air Act

The U.S. Environmental Protection Agency is requiring Waste Management of Ohio (Waste Management or you) to submit certain information about the facility at 2625 East Broadway Street, Northwood, Ohio. Appendix A provides the instructions needed to answer this information request, including instructions for electronic submissions. Appendix B specifies the information that you must submit. You must send this information to us within 30 calendar days of receipt of this request.

We are issuing this information request under Section 114(a) of the Clean Air Act (the CAA), 42 U.S.C. § 7414(a). Section 114(a) authorizes the Administrator of EPA to require the submission of information. The Administrator has delegated this authority to the Director of the Air and Radiation Division, Region 5.

Waste Management owns and operates an emission source at the Northwood, Ohio facility (the facility). We are requesting this information to determine whether your emission source is complying with the Ohio State Implementation Plan, the CAA, and its Title V Permit.

Waste Management must send all required information to:

Attn: Compliance Tracker, AE-17J
Air Enforcement and Compliance Assurance Branch
U.S. Environmental Protection Agency
Region 5
77 W. Jackson Boulevard
Chicago, Illinois 60604

Waste Management must submit all required information under an authorized signature with the following certification:

I certify under penalty of law that I have examined and am familiar with the information in the enclosed documents, including all attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are, to the best of my knowledge and belief, true and complete. I am aware that there are significant penalties for knowingly submitting false statements and information, including the possibility of fines or imprisonment pursuant to Section 113(c)(2) of the Clean Air Act and 18 U.S.C. §§ 1001 and 1341.

As explained more fully in Appendix C, you may assert a claim of business confidentiality under 40 C.F.R. Part 2, Subpart B for any part of the information you submit to us. Information subject to a business confidentiality claim is available to the public only to the extent, and by means of the procedures, set forth at 40 C.F.R. Part 2, Subpart B. If you do not assert a business confidentiality claim when you submit the information, EPA may make this information available to the public without further notice. You should be aware, moreover, that pursuant to Section 114(c) of the CAA and 40 C.F.R. § 2.301(a) and (f), emissions data, standards and limitations are not entitled to confidential treatment and shall be made available to the public notwithstanding any assertion of a business confidentiality claim. Appendix C provides additional information regarding the meaning and scope of the term "emissions data."

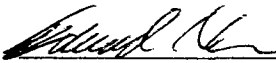
This information request is not subject to the Paperwork Reduction Act, 44 U.S.C. § 3501 *et seq.*, because it seeks collection of information from specific individuals or entities as part of an administrative action or investigation.

We may use any information submitted in response to this request in an administrative, civil or criminal action.

Failure to comply fully with this information request may subject Waste Management to an enforcement action under Section 113 of the CAA, 42 U.S.C. § 7413.

You should direct any questions about this information request to Kenneth Ruffatto at 312 886-7886.

8/12/16
Date


Edward Nam
Acting Director
Air and Radiation Division

Appendix A

When providing the information requested in Appendix B, use the following instructions and definitions.

Instructions

1. Provide a separate narrative response to each question and subpart of a question set forth in Appendix B.
2. Precede each answer with the number of the question to which it corresponds and, at the end of each answer, identify the person(s) who provided information used or considered in responding to that question, as well as each person consulted in the preparation of that response.
3. Indicate on each document produced, or in some other reasonable manner, the number of the question to which it corresponds.
4. When a response is provided in the form of a number, specify the units of measure of the number in a precise manner.
5. Where information or documents necessary for a response are neither in your possession nor available to you, indicate in your response why the information or documents are not available or in your possession, and identify any source that either possesses or is likely to possess the documents or information.
6. If information not known or not available to you as of the date of submission later becomes known or available to you, you must supplement your response. Moreover, should you find at any time after the submission of your response that any portion of the submitted information is false or incorrect, you must notify EPA as soon as possible.

Electronic Submissions

To aid in our electronic recordkeeping efforts, we request that you provide all documents responsive to this information request in an electronic format according to paragraphs 1 through 6, below. These submissions are in lieu of hard copy.

1. Provide all responsive documents in Portable Document Format (PDF) or similar format, unless otherwise requested in specific questions. If the PDFs are scanned images, perform at least Optical Character Recognition (OCR) for "image over text" to allow the document to be searchable. Submitters providing secured PDFs should also provide unsecured versions for EPA use in repurposing text.
2. When specific questions request data in electronic spreadsheet form, provide the data and corresponding information in editable Excel or Lotus format, and not in image format. If Excel or Lotus formats are not available, then the format should allow for data to be used in calculations by a standard spreadsheet program such as Excel or Lotus.

3. Provide submission on physical media such as compact disk, flash drive or other similar item.
4. Provide a table of contents for each compact disk or flash drive containing electronic documents submitted in response to our request so that each document can be accurately identified in relation to your response to a specific question. *We recommend the use of electronic file folders organized by question number.* In addition, each compact disk or flash drive should be labeled appropriately (e.g., Company Name, Disk 1 of 4 for Information Request Response, Date of Response).
5. Documents claimed as confidential business information (CBI) must be submitted on separate disks/drives apart from the non-confidential information. This will facilitate appropriate records management and appropriate handling and protection of the CBI. Please follow the instructions in Appendix C for designating information as CBI.
6. Certify that the attached files have been scanned for viruses and indicate what program was used.

Definitions

All terms used in this information request have their ordinary meaning unless such terms are defined in the CAA, 42 U.S.C. §§ 7401 *et seq.*, Standards of Performance for Municipal Solid Waste Landfills at 40 C.F.R. Part 60, Subpart WWW, or National Emission Standards for Hazardous Air Pollutants for Municipal Solid Waste Landfills at 40 C.F.R. Part 63, Subpart AAAA.

1. The terms "document" and "documents" shall mean any object that records, stores, or presents information, and includes writings, memoranda, records, or information of any kind, formal or informal, whether wholly or partially handwritten or typed, whether in computer format, memory, or storage device, or in hardcopy, including any form or format of these. If in computer format or memory, each such document shall be provided in translation to a form useable and readable by EPA, with all necessary documentation and support. All documents in hard copy should also include attachments to or enclosures with any documents.
2. The terms "relate to" or "pertain to" (or any form thereof) shall mean constituting, reflecting, representing, supporting, contradicting, referring to, stating, describing, recording, noting, embodying, containing, mentioning, studying, analyzing, discussing, evaluating or relevant to.

Appendix B

Information You Are Required to Submit to EPA

Waste Management must submit the following information relating to the facility pursuant to Section 114(a) of the CAA, 42 U.S.C. § 7414(a):

1. Provide copies of the following:
 - a. The initial site design capacity report that triggered applicability of 40 C.F.R. § 60.752(b) and all site design capacity reports (waste-in-place and waste acceptance rates) since January 2012;
 - b. Gas Collection and Control System (GCCS) Design Plan, including the initial plan and all revisions; include explanations of why the revisions were made;
 - c. All GCCS performance tests, including the initial performance test in accordance with 40 C.F.R. § 60.757(g) and all subsequent performance or engineering tests;
 - d. Startup, Shutdown, and Malfunction (SSM) Plan; and
 - e. The initial non-methane organic compound (NMOC) emission rate report and all annual NMOC emission rate reports submitted to EPA or the Ohio Environmental Protection Agency (Ohio EPA) since January 2012.
2. Provide current site map(s) displaying the following information:
 - a. GCCS;
 - b. Landfill cells including contours for land elevation and their current status as active or closed; and
 - c. All interior and perimeter gas probes or wells, including date(s) of installation.
3. In electronic spreadsheet form, provide the monthly quantity (tons) of waste accepted at the landfill since January 2012. Include a breakdown by type of waste (i.e. municipal solid waste, construction and demolition, asbestos, sludge, etc.) and specify the landfill location(s) or cell(s) in which each type of waste was placed.
4. Provide a description of the daily cover used at the landfill and the procedure for placing and removing it. If applicable, provide a standard operating procedure for daily cover.
5. Provide a cut diagram of the landfill layers, including scale, and also provide a description and documentation related to:
 - a. Cover (both final and interim);
 - b. Liners on all parts of the landfill; and
 - c. Fill (description of how waste is placed).
6. Provide a copy or detailed description and reports for any cover integrity programs or plans implemented at the landfill as required in 40 C.F.R. § 60.755(c)(5), including date(s) and description(s) of all cover repairs and corrective actions since January 2012.

7. Provide a detailed description of how Surface Emission Monitoring (SEM) is performed at the landfill. Include in your response a description and map of the path traveled, any diversions made from that path, method(s) of transportation, the type of instrument used, sample flow rate, and how exceedances are recorded and corrected.
8. Provide a description of leachate management on-site and the number of gas extraction wells that contain pumps for leachate removal. Include in your response any documents related to depth to bottom and depth to liquid in the wells.
9. In electronic spreadsheet format, provide the date of construction of all gas wells and provide dates of all redrills. Include with your response justification for all redrills and addition of any wells since January 2012; justification should include all engineering studies done to determine well placement.
10. Provide a copy of all alternative timeline requests submitted to OEPA or EPA since January 2012 in accordance with 40 C.F.R. § 60.755(a)(3) and (a)(5). For each alternative timeline request, provide a copy of OEPA or EPA's response.
11. Provide all reports, documents, or engineering studies related to the radius of influence and gas extraction efficiency of the gas extraction wells at the landfill.
12. In electronic spreadsheet format, where applicable, provide all information related to the following types of monitoring activities conducted since January 2012. For each, include date(s) and description(s) of all monitoring activity and corrective actions taken as a result of monitoring:
 - a. GCCS wellhead monitoring data including gas quality (methane, oxygen, and nitrogen), temperature, and pressure;
 - b. SEM data, including but not limited to all methane exceedances, follow-up monitoring from exceedances, and any surface monitoring done outside of the required quarterly monitoring; and
 - c. Flare or control device monitoring data, including but not limited to temperature or heat sensing data, gas flow rate to the control device or bypass, and hours of operation each month. Denote all times the pilot flame or flare flame is absent.
13. Provide the following information related to flares on site:
 - a. Flare manufacturer and model;
 - b. Date of installation;
 - c. Schematic of flare system including blower, header, and piping;
 - d. Flare diameter;
 - e. Flare design and operation specifications (typically from the manufacturer);
 - f. Design destruction efficiency for NMOC;
 - g. Description of automatic shutdown feature of the flare and how it works;
 - h. All written operation and maintenance procedures, not including the Startup, Shutdown and Malfunction Plan.

- i. Description of equipment and methodology used for monitoring the continuous presence of the flame at the flare. Provide the make, model, and manufacturer's specifications for the monitoring device used.
14. In electronic spreadsheet format, provide air emissions calculations since January 2012 for NMOC, CH₄, PM₁₀, SO₂, NO_x, CO, and HCl from the facility flare. Include in your response a narrative describing the method used for the emissions calculations, including the basis of any emission factors or assumptions used, and any documents outlining procedures for calculating emissions
15. Provide the results of any analyses of landfill gas (LFG) for sulfur, NMOC, and net heat content. Also provide the overall sulfur content of the collected LFG in pounds per hour based upon LFG volumetric flow rate and LFG sulfur data.
16. Provide copies of all documents related to leak detection of the GCCS. Include in your response leak detection of gas wells, header lines, flare stations, and gas treatment system.
17. Provide a copy of all visible emission readings, stack tests, performance tests, engineering studies, and air emission calculations related to gas emissions at the landfill unless already provided above.
18. Provide copies of all reports submitted in accordance with 40 C.F.R. § 60.757(f) since January 2012, including a narrative of steps taken to minimize landfill gas emissions during any times the collection or control device was not operating.
19. Provide copies of all deviation reports submitted to the OEPA since January 2012.
20. Provide descriptions and relevant documents, including data collected, for all pilot programs or projects performed at the landfill. Your response should include, but not be limited to, the leachate recirculation project and bio-remediation system. For each program or project, indicate the start date and end date (if applicable). If a program or project has been decommissioned, provide an explanation of the steps taken to remove any associated equipment from service and a list of any equipment still in place on site.
21. Provide a record of all citizen complaints received by Waste Management since January 2012. For each complaint, your response should include, but not be limited to, the date the complaint was received, a description of the complaint, description of corrective action(s) taken including the date(s), and copies of all documentation and written communication related to the complaint and corrective action.

Appendix C

Confidential Business and Personal Privacy Information

Assertion Requirements

You may assert a business confidentiality claim covering any parts of the information requested in the attached Appendix B, as provided in 40 C.F.R. § 2.203(b).

Emission data provided under Section 114 of the CAA, 42 U.S.C. § 7414, is not entitled to confidential treatment under 40 C.F.R. Part 2.

“Emission data” means, with reference to any source of emissions of any substance into the air:

Information necessary to determine the identity, amount, frequency, concentration or other characteristics (to the extent related to air quality) of any emission which has been emitted by the source (or of any pollutant resulting from any emission by the source), or any combination of the foregoing;

Information necessary to determine the identity, amount, frequency, concentration or other characteristics (to the extent related to air quality) of the emissions which, under an applicable standard or limitation, the source was authorized to emit (including to the extent necessary for such purposes, a description of the manner and rate of operation of the source); and

A general description of the location and/or nature of the source to the extent necessary to identify the source and to distinguish it from other sources (including, to the extent necessary for such purposes, a description of the device, installation, or operation constituting the source).

40 C.F.R. § 2.301(a)(2)(i)(A), (B) and (C).

To make a confidentiality claim, submit the requested information and indicate that you are making a claim of confidentiality. Any document for which you make a claim of confidentiality should be marked by attaching a cover sheet stamped or typed with a caption or other suitable form of notice to indicate the intent to claim confidentiality. The stamped or typed caption or other suitable form of notice should employ language such as “trade secret” or “proprietary” or “company confidential” and indicate a date, if any, when the information should no longer be treated as confidential. Information covered by such a claim will be disclosed by EPA only to the extent permitted and by means of the procedures set forth at Section 114(c) of the CAA and 40 C.F.R. Part 2. Allegedly confidential portions of otherwise non-confidential documents should be clearly identified. EPA will construe the failure to furnish a confidentiality claim with your response to the information request as a waiver of that claim, and the information may be made available to the public without further notice to you.

Determining Whether the Information Is Entitled to Confidential Treatment

All confidentiality claims are subject to EPA verification and must be made in accordance with 40 C.F.R. § 2.208, which provides in part that you must satisfactorily show: that you have taken reasonable measures to protect the confidentiality of the information and that you intend to continue to do so, that the information is not and has not been reasonably obtainable by legitimate means without your consent and that disclosure of the information is likely to cause substantial harm to your business's competitive position.

Pursuant to 40 C.F.R. Part 2, Subpart B, EPA may at any time send you a letter asking that you support your confidential business information (CBI) claim. If you receive such a letter, you must respond within the number of days specified by EPA. Failure to submit your comments within that time would be regarded as a waiver of your confidentiality claim or claims, and EPA may release the information. If you receive such a letter, EPA will ask you to specify which portions of the information you consider confidential by page, paragraph and sentence. Any information not specifically identified as subject to a confidentiality claim may be disclosed to the requestor without further notice to you. For each item or class of information that you identify as being CBI, EPA will ask that you answer the following questions, giving as much detail as possible:

1. For what period of time do you request that the information be maintained as confidential, e.g., until a certain date, until the occurrence of a special event or permanently? If the occurrence of a specific event will eliminate the need for confidentiality, please specify that event.
2. Information submitted to EPA becomes stale over time. Why should the information you claim as confidential be protected for the time period specified in your answer to question number 1?
3. What measures have you taken to protect the information claimed as confidential? Have you disclosed the information to anyone other than a governmental body or someone who is bound by an agreement not to disclose the information further? If so, why should the information still be considered confidential?
4. Is the information contained in any publicly available databases, promotional publications, annual reports or articles? Is there any means by which a member of the public could obtain access to the information? Is the information of a kind that you would customarily not release to the public?
5. Has any governmental body made a determination as to confidentiality of the information? If so, please attach a copy of the determination.
6. For each category of information claimed as confidential, explain with specificity why release of the information is likely to cause substantial harm to your competitive position. Explain the specific nature of those harmful effects, why they should be viewed as

substantial and the causal relationship between disclosure and such harmful effects. How could your competitors make use of this information to your detriment?

7. Do you assert that the information is submitted on a voluntary or a mandatory basis? Please explain the reason for your assertion. If you assert that the information is voluntarily submitted information, explain whether and why disclosure of the information would tend to lessen the availability to EPA of similar information in the future.
8. Is there any other information you deem relevant to EPA's determination regarding your claim of business confidentiality?

If you receive a request for a substantiation letter from the EPA, you bear the burden of substantiating your confidentiality claim. Conclusory allegations will be given little or no weight in the determination. In substantiating your CBI claim(s), you must bracket all text so claimed and mark it "CBI." Information so designated will be disclosed by EPA only to the extent allowed by and by means of the procedures set forth in 40 C.F.R. Part 2, Subpart B. If you fail to claim the information as confidential, it may be made available to the public without further notice to you.

Personal Privacy Information

Please segregate any personnel, medical and similar files from your responses and include that information on a separate sheet(s) marked as "Personal Privacy Information." Disclosure of such information to the general public may constitute an invasion of privacy.

CERTIFICATE OF MAILING

I, Loretta Shaffer, certify that I sent a Request to Provide Information Pursuant to the
Clean Air Act by Certified Mail, Return Receipt Requested, to:

John Randolph
Waste Management
2625 E. Broadway Street
Northwood, Ohio 43619

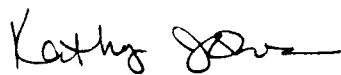
I also certify that I sent a copy of the Request to Provide Information Pursuant to the
Clean Air Act by E-mail to:

Bob Hodanbosi
Chief, Division of Air Pollution Control
bob.hodanbosi@epa.ohio.gov

and

Mark Budge
APC Manager
mark.budge@toledo.oh.gov

On the 15th day of August 2016.


for Loretta Shaffer, Program Technician
AECAB, PAS

CERTIFIED MAIL RECEIPT NUMBER: 7009 1680 0000 7646 9586